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June 15, 2023

Via ECF

The Honorable Elizabeth A. Pascal
United States District Court
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: Lavell v. Camden County College
Civil Action No.: 1:21-cv-06832-KMW-EAP

Dear Judge Pascal:

We represent the Defendant, Camden County College, in the above matter. On May 3, 2023, the parties appeared before Your Honor for oral argument regarding Defendant's application to strike the rebuttal expert report of Plaintiff's expert, Dr. Don Thompson. Pursuant to Your Honor's Scheduling Order, dispositive motions are currently due to be filed no later than June 23, 2023. We write to respectfully request an extension of the deadline to file dispositive motions until such time as Your Honor renders a decision on Defendant's application to strike Plaintiff's rebuttal expert report. To the extent that Your Honor is inclined to reopen and extend expert discovery to allow for Defendant to submit a sur-rebuttal report, extending the deadline until after Your Honor's ruling would allow the parties to complete any additional expert discovery, if so ordered, prior to filing dispositive motions. We have conferred with Plaintiff's counsel, Mr. William Rieser, and he does not oppose this request.

We thank the Court for its consideration of this matter.

Respectfully submitted,
BROWN & CONNERY, LLP

s/ Kathleen E. Dohn
Kathleen E. Dohn

cc: William Rieser, Esquire (*via ECF*)